



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

Certified Mail No.

Agency Interest (AI) No.: 121722
Activity No.: PER20060001

Marshall D. Owens, Jr.
BCP Liquidating LLC
1555 Cottdale Drive, Suite 2
Baton Rouge, Louisiana 70815

RE: Transfer of NO_x Emission Reduction Credits to Shintech Louisiana LLC

Dear Mr. Owens:

On May 3, 2005, the Department issued an Emission Reduction Credit (ERC) Certificate to BCP Liquidating LLC (BCP) reflecting the creditable NO_x reductions realized by permanently shutting down a portion of the Methanol Plant formerly owned by Borden Chemicals and Plastics Operating Limited Partnership. This certificate also reflected the transfer of 4 tons of ozone season (O₃) NO_x ERC to Air Products and Chemicals, Inc. (AI 2679).

By letter dated January 24, 2006, BCP notified the Department that 65.5 tons of ozone season (O₃) NO_x ERC and 91.6 tons of non-ozone season (non-O₃) NO_x ERC generated by the aforementioned shutdown will be sold to Shintech Louisiana LLC (Shintech) (AI 126578).

These reductions were originally determined to be surplus, permanent, quantifiable, and enforceable in accordance with LAC 33-III Chapter 6 as documented in the "Analysis of Validity of Emission Reductions as ERCs" associated with the transfer of NO_x ERC to Air Products and Chemicals, Inc. The Air Permits Division has reevaluated the reductions and concluded that no new state or federal laws or regulations promulgated since May 3, 2005, would have required additional NO_x control from the affected emissions units.

Further, because the design value for the nonattainment area is above the national ambient air quality standard (NAAQS) for ozone, a comparison of the current total point-source emissions inventory for the nine modeled parishes (calendar year 2004) and the base case inventory was performed. The current total point-source emissions inventory (for NO_x) of 164.88 tons per day (TPD) is less than the base case inventory of 264.0 TPD; therefore, the lower of actual emissions or adjusted allowable emissions continues to be the limiting factor as per LAC 33-III:607.C.4.a.ii.

A notice requesting public comment on the transfer was published in both *The Advocate* and *The Gonzales Weekly* on June __, 2006. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on June __, 2006.

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

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Mr. Marshall D. Owens, Jr.
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Attached is BCP's revised ERC Certificate reflecting the transfer of O₃ and non-O₃ NO_x ERC. An ERC Certificate will be issued to Shintech separately. If you have any questions, please call Bryan D. Johnston of the Air Permits Division at (225) 219-3118.

Sincerely,

Chuck Carr Brown, Ph.D.
Assistant Secretary

Date

CCB:BDJ

Proposed

Louisiana Department of Environmental Quality

Emission Reduction Credit Certificate

Item Number: 121722PER20060002
Owner: BCP Liquidating, LLC
Phone number: (225) 924-4187
Company Address: 1555 Cottandale Drive, Suite 2
Baton Rouge, LA 70815

EMISSION REDUCTION INFORMATION

Physical Location: Geismar, Ascension Parish

Method of ERC creation: Permanent shutdown of Golden Chemicals and Plastics Operating Limited Partnership's Methanol Plant except for the methanol tank farm and barge loading operation, which were sold to Hexion Specialty Chemicals - AI 92504. Certificate reflects transfer of O₃ and non-O₃ NO_x ERC to Shintech (126578).

Pollutant: NO_x

Amount of ERC debited:	157.10*	New ERC balance:	347.32 - Offsets*
	*65.50 - O ₃ ERC		245 - O ₃ ERC
	91.60 - Non-O ₃ ERC		345.17 - Non-O ₃ ERC
			0.00 - Netting

Date of emission reduction: January 1, 2001

Permit Number: 2303

Assistant Secretary

Date



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Agency Interest (AI) No. 126578

Activity No. PER20060003

David V. Wise
Plant Manager
Shintech Louisiana, LLC
P.O. Box 358
Addis, LA 70710

RE: Transfer of NO_x Emission Reduction Credits from BCP Liquidating LLC

Dear Mr. Wise:

On May 3, 2005, the Department issued an Emission Reduction Credit (ERC) Certificate to BCP Liquidating LLC (BCP) (AI 121722) reflecting the creditable NO_x reductions realized by permanently shutting down a portion of the Methanol Plant formerly owned by Borden Chemicals and Plastics Operating Limited Partnership. This certificate also reflected the transfer of 4 tons of ozone season (O₃) NO_x ERC to Air Products and Chemicals, Inc. (AI 2679).

By letter dated January 24, 2006, BCP notified the Department that 65.5 tons of ozone season (O₃) NO_x ERC and 91.6 tons of non-ozone season (non-O₃) NO_x ERC generated by the aforementioned shutdown will be sold to Shintech Louisiana, LLC (Shintech).

This letter serves to acknowledge the transfer of ERC from BCP to Shintech. Per LAC 33:III.617.C.3, the role of the Department in the transfer of an ERC certificate shall be limited to providing information to the public, documenting ERC transfers, and registering ERC certificates. In the case of a partial transfer, the Department shall issue a new certificate to the new owner as well as a revised certificate to the current owner reflecting the available credits to each owner. The banking database shall be adjusted accordingly.

Attached is Shintech's ERC Certificate. A revised certificate will be issued to BCP separately. If you have any questions, please call Bryan D. Johnston of the Air Permits Division at (225) 219-3118.

Sincerely,

Chuck Carr Brown, Ph.D.
Assistant Secretary

Date

CCB:BDJ

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

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Louisiana Department of Environmental Quality Emission Reduction Credit Certificate

Item Number: 126578PER20060003
Owner: Shintech Louisiana, LLC
Phone number: (225) 687-8183
Company Address: P.O. Box 358
Addis, LA 70710

EMISSION REDUCTION INFORMATION

Physical Location: 26270 Highway 405 River Road South
Plaquemine, Iberville Parish

Method of ERC creation: Transfer of 65.5 tons of ozone season credits (O₃ ERC) and 91.6 tons of non-ozone season credits (non-O₃ ERC) from BCP Liquidating LLC (AI 121722)

Pollutant: NO_x

Amount of ERC transferred: 157.10 tons*
*65.50 – O₃ ERC
91.60 – Non-O₃ ERC

New ERC balance: 157.10 tons – Offsets*
*65.50 – O₃ ERC
91.60 – Non-O₃ ERC
0.00 tons – Netting

Date of emission reduction: January 1, 2001

Permit Number: 2303 (Borden Chemicals and Plastics Operating
Limited Partnership's Methanol Plant)

Assistant Secretary

Date

LAC 33:III.607.C INVENTORY COMPARISON

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

If the design value for the nonattainment area is above the national ambient air quality standard (NAAQS) for ozone, the department shall compare the current total point-source emissions inventory for the modeled parishes to the base case inventory, except that beginning with the 2005 emissions inventory, this comparison shall be made to the base line inventory.

The design value for the nonattainment area is above the national ambient air quality standard (NAAQS) for ozone, so a comparison between the current total point-source emissions inventory for the modeled parishes¹ (calendar year 2004) and the base case inventory² was performed. The current total point-source emissions inventory is 60.43 tons per day (TPD) for VOC and 168.2 TPD for NO_x, whereas the base case inventory is 71.3 TPD for VOC and 264.0 TPD for NO_x. Therefore, the current total point-source emissions inventory is *less than* the base case inventory.

	VOC	NO _x
Aggregate point-source emissions inventory from the nine modeled parishes: ³	15,477.62 TPY 42.40 TPD	57,410.46 TPY 157.29 TPD
Banked ERC and pending ERC applications originally included in the base case inventory that have not expired: ⁴	18.03 TPD	10.91 TPD
Current total point-source emissions inventory:	60.43 TPD	168.2 TPD
Base case inventory:	71.3 TPD	264.0 TPD
Base line inventory: ⁵	71.3 TPD	164.9 TPD

¹*Current Total Point-Source Emissions Inventory*—the aggregate point-source emissions inventory for either NO_x or VOC from the nine modeled parishes compiled from Emission Inventory System (EIS) records and updated annually in accordance with LAC 33:III.919, plus any banked ERC and pending ERC applications originally included in the base case inventory that have not expired.

²*Base Case Inventory*—the aggregate point-source emissions inventory for either NO_x or VOC from the nine modeled parishes, as modeled for the 2005 Attainment Plan and Transport Demonstration SIP dated December 2001, which includes 1997 actual emissions from point sources, banked ERC and pending ERC applications where the emission reduction occurred between January 1, 1990 and December 31, 1997, and adjustments for growth. Separate inventories have been established for NO_x and VOC.

³Aggregate point-source emissions from the nine modeled parishes, derived from EIS records (LAC 33:III.919). Data is available at <http://www.deq.louisiana.gov/portal/default.aspx?tabid=1758>. In order to be conservative, emissions from all mobile sources were attributed to the nine parishes modeled.

⁴In order to be conservative, all banked ERC and pending ERC applications originally included in the base case inventory, including those that have expired, were added to the aggregate point-source emissions inventory from the nine modeled parishes.

⁵*Base Line Inventory*—the aggregate point-source emissions inventory for either NO_x or VOC from the nine modeled parishes associated with the 2005 Attainment Plan and Transport Demonstration SIP dated December 2001, which accounts for emission reductions modeled to demonstrate attainment of the 1-hour national ambient air quality standard (NAAQS) for ozone. Separate inventories have been established for NO_x and VOC.

Certified Criteria Pollutant Emissions for Year 2004 in Tons Per Year

Source: LDEQ EIS Database, 12/27/2005

Parish	EIS ID	AI ID	Facility	Total Voc Nox	
0180	0001	3420	ORMET CORP/ALUMINA PLANT	9	629
0180	0002	1093	MONOCHEM, INC./GEISMAR FAC	11	438
0180	0003	2082	HONEYWELL INTL INC/GEISMAR WRKS	49	75
0180	0004	2416	CF INDUSTRIES, INC./DONALDSONVILLE NITROGEN	247	3481
0180	0005	2398	TERRA MISSISSIPPI NITROGEN INC/DONALDSONVILLE FAC	2.1	20.95
0180	0006	1468	RUBICON, LLC	241.74	583.04
0180	0007	67572	DUPONT CHEMICALS/BURNSIDE PLANT	2	55
0180	0008	1138	GEISMAR VINYL CO, LP	53	20
0180	0009	2245	TRIAD NITROGEN LLC	39	853
0180	0010	1136	SHELL CHEMICAL LP/GEISMAR PLNT	518	714
0180	0011	3400	VULCAN CHEMICALS	70	129
0180	0012	1433	CROMPTON MFG CO/GEISMAR PLANT	816	86
0180	0013	2049	BASF CORPORATION/GEISMAR SITE	145	695
0180	0014	8142	WAGNER OIL CO/DARROW GRC BATTERY	58	18
0180	0015	2218	PRAXAIR INC/GEISMAR	21	183
0180	0016	3302	EL PASO FLD SRVCS LP/RIVERSIDE	93	177
0180	0018	4762	ENTERPRISE GAS PROC LLC/TEBONE FRAC PLNT	160	35
0180	0019	90203	PLAINS MARKETING LP/DARROW CRUDE OIL TERM	0	0
0180	0021	4803	BFI WASTE SYSTEMS OF N.A.,INC/COLONIAL LANDFILL	1	6
0180	0028	3732	PCS NITROGEN FERTILIZER,L.P./GEISMAR	3	228
0180	0029	39945	ORMET CORP/BURNSIDE BULK MARINE TERMINAL	4	49
0180	0030	5565	WILLIAMS OLEFINS LLC/GEISMAR ETHYLENE	227	771
0180	0034	41417	SHELL PIPELINE CO LP/SORRENTO DOME PPL STA	7	2
0180	0036	2679	AIR PRODUCTS & CHEMICALS,INC/SYNGAS PLT	4	57
0180	0040	529	UNIVAR USA, INC/GEISMAR	2	0
0180	0048	11416	BRIDGELINE HOLDINGS LP/SORRENTO UNDERGROUND GAS SF	16	20
0180	0057	17771	T T BARGE CLEANING INC/MILE 183	9.28	1.61
0180	0069	30073	AIR PRODUCTS & CHEMICALS,INC/DINITROTOLUENE	4	26
0180	0073	31513	AIR LIQUIDE AMERICA CORP/GEISMAR	3	196
0180	0076	31514	GABRIEL CHEMICALS LLC/CHLOROSULFONIC ACID PLANT	0	0
0180	0079	3990	WAGNER OIL CO CO/DARROW COMM LEASE	0	0
0180	0082	92534	BORDEN CHEM INC/FORMALDEHYDE PLANT	36	0
0180	0086	83718	LOUIS DREYFUS OLEFINS LLC/GEISMAR FRAC PLT	20	54
0180	0089	86181	TEXACO PIPELINES LLC/SORRENTO TENDS PUMP STN	13	0
0180	0091	100651	LOUIS DREYFUL OLEFINS LLC/SORRENTO GAS PLANT	15	1
0180	0092	88164	ENTERPRISE PROD OPER LP/SORRENTO RAIL RACK	1	0
0180	0096	97675	CHEMTECH CHEMICALS/CHEMICAL BLENDING	0.24	0
0180	0097	99129	NOVUS LA, LLC/UNITED LANDS #1	6	1
0180	0104	20506	ENTERPRISE PRODUCTS CO/SORRENTO PHT	28	3
0180	0187	27834	EXXONMOBIL PIPELINE CO/SORRENTO STORAGE	37	2
0180	0188	26272	DSI TRANSPORTS, INC	18	1
0840	0001	289	HONEYWELL/BATON ROUGE PLNT	224	25
0840	0002	288	FORMOSA PLASTICS CORPORATION, LA	22	222
0840	0003	3519	EXXONMOBIL CHEM CO/B.R. POLYOLEFINS	130	139
0840	0004	1396	EXIDE TECHNOLOGIES/B R SMELTER	0	14
0840	0005	88139	BP AMERICA PROD/PT HUDSON CTB	64	31
0840	0006	248	DELTECH CORPORATION	29	240
0840	0008	1395	LION COPOLYMER/BR PLANT	70	93
0840	0009	1413	UOP LLC/BR PLNT	1	24
0840	0010	2617	GEORGIA PACIFIC/PT HUDSON OPERATNS	509	1714
0840	0011	8007	FLORIDA GAS TRANSMISSION CO/ZACHARY COMP STN	62	755

0840	0014	286	EXXONMOBIL CHEM CO/BR CHEM PLT	1682	2657
0840	0015	2638	EXXONMOBIL REF & SUPPLY CO/B R REFINERY	1598	2970
0840	0016	1186	ENTERGY GSI/LA STN 2	0	0
0840	0017	3085	ETHYL CORPORATION	0.5	0
0840	0018	285	EXXONMOBIL CHEM/BR PLASTICS PLNT	310	132
0840	0019	1516	CLEAN HARBORS BATON ROUGE, LLC	7	2
0840	0021	29884	GREAT LAKES CARBON CORP/BR CALCINED COKE PLT	7.7	383.2
0840	0023	3387	FERRO CORPORATION/BATON ROUGE SITE	10	12
0840	0033	1314	RHODIA INC/BR FAC	22	81
0840	0048	5190	ALLWASTE CONTAINER SVCS/BATON ROUGE PLANT	1	2
0840	0053	582	PLANTATION PIPE LINE CO/BR TANK FARM	855.26	0
0840	0063	3230	EXXONMOBIL CHEM CO/RESIN FINSHNG PLT	13	17
0840	0092	1000	ASHLAND CHEM CO/B.R. DISTRIBUTION	8	0
0840	0112	90176	B P PIPELINES NORTH AMERICA/PT HUDSON TERMINAL	27	0
0840	0127	332	EXXONMOBIL/B R MARKETING TERM	27	0
0840	0128	5540	LOUISIANA STATE UNIVERSITY	6.66	129.6
0840	0135	27559	BAYOU COATING LLC	11	1
0840	0138	32045	VINTAGE PETROLEUM INC/MANCHAC POINT	69	25
0840	0150	669	ALBEMARLE CORP./PROC DEV'MENT CTR	17	14
0840	0158	32050	SCHERING-PLOUGH ANIMAL HEALTH CORP/VET OPERATIONS	1.81	1
0840	0164	25383	LAMAR CORP/LAMAR GRAPHICS	37.17	0
0840	0168	32056	EXXON MOBIL CORP/EMPR	5	0
0840	0171	11595	FLOWERS BAKING CO OF BATON ROUGE LLC	51.23	1.44
0840	0173	22750	EDO SPECIALTY PLASTICS	14	0
0840	0174	4407	EBRP RENEWABLE ENERGY CTR	3	6
0840	0181	1186	ENTERGY/LA STATION 1	51	2087
0840	0182	17129	HILCORP ENERGY CO/COMITE FIELD FACILITY	9	9
0840	0186	98136	HILCORP ENERGY CO/COBB #1 COMITE FIELD	2	8
0840	0188	96336	AMITECH USA/BATON ROUGE PLANT	13	1
0840	0190	100311	CUSTOM BLAST SVCS/SCENIC HWY YARD	0	0
0840	0195	114658	JP OIL CO INC/SIEGEN PROD FAC	14.56	20.96
0840	0196	114659	JP OIL CO INC/PORT HUDSON FIELD PROD FAC	3.61	0.05
0840	0200	119007	BRECHTEL UNIVERSITY PARTNERS LLC/DUPLANTIER TANK BATTERY	10	0
0840	0201	119008	C&M OPERATING CO LLC/NELSON TANK BATTERY-UNIV. FIELD	24	18
0840	0222	4993	BP AMERICA PROD/PT HUDSON GAS PLNT	26	3
0840	0224	3587	PPG IND INC/BATON ROUGE SOLVENT PLT	1.8	0
0880	0001	4211	TRANSCONTINENTAL GAS PIPE LINE/CS 61	0	0
0880	0002	27646	COLONIAL PIPELINE CO/TANK FARM 1	0	0
0880	0003	27646	COLONIAL PIPELINE CO/TANK FARM 2	76	3
0880	0004	32061	TRANSCONTINENTAL GAS PIPE LINE/CS 60	206	3644
0880	0007	588	SHELL PIPELINE CO LP/BR PRDCTS STN	194	0
0880	0009	689	MARATHON ASHLAND PIPELINE LLC/ZACHARY TERMINAL	133.9	0
0880	0016	118458	OSPREY PETROLEUM (LA) INC/SONNY JOHNSTON #1 PROD FAC	0	0
1280	0002	2455	GEORGIA GULF CHEM & VINYLs LLC/PLAQUEMINE	166	1192
1280	0004	1306	CORA TEXAS MFG INC/SUGAR MILL	11	174
1280	0005	2043	PETROLOGISTICS OLEFINS LLC/CHOCTAW TERMINAL	18	12
1280	0007	2367	SYNGENTA CROP PROTECTION INC/ST. GABRIEL PLANT	95	191
1280	0008	1409	DOW CHEMICAL CO/LA OPERATIONS	1778	5232
1280	0009	3129	ASHLAND CHEMICAL CO/PLAQUEMINE METHANOL PLNT	0	0
1280	0010	2625	ENTERGY GSI/WILLOW GLEN	23	459
1280	0013	1607	TOTAL PETROCHEMICALS USA INC/COSMAR COMPANY STYRENE PLANT	144	379
1280	0015	7359	TEXAS EASTERN TRANSMISSION, LP/WHITE CASTLE CS	8	101
1280	0018	39978	KINDER MORGAN LIQUIDS TERMINAL LLC/ST GABRIEL TERMINAL	6	0
1280	0019	4197	SOUTHERN NATURAL GAS/WHITE CASTLE CS	27	266.05
1280	0020	3263	AIR PRODUCTS & CHEMICALS,INC/ST. GABRIEL	17	72

1280	0023	3492	LBC BATON ROUGE LLC/SUNSHINE TERM	58	1
1280	0024	32135	JP OIL CO/WHITE CASTLE FLD	37.08	22.71
1280	0025	32133	G & A INTERNATIONAL/BAYOU SORREL	90	43
1280	0036	5176	TOTAL PETROCHEMICALS USA INC/CARVILLE POLYSTYRENE	14	40
1280	0040	14535	INEOS FLUOR AMERICAS LLC/KLEA-134A PLANT	3.8	17.5
1280	0044	26034	LA ENERGY & POWER AUTHORITY/PLAQUEMINE STEAM & DIESEL PWR PLT	0	10
1280	0048	17383	CROSSTEX LIG LLC/MYRTLE GROVE CS	13.3	29.62
1280	0049	19184	CROSSTEX LIG LIQUIDS CO LLC/PLAQUEMINE GAS	35.69	93.35
1280	0050	2644	PIONEER AMERICAS LLC	2.09	18.74
1280	0052	27495	BIOPRODUCTS OF LA LLC/GULF COAST	15.17	1.61
1280	0054	85393	PETRO HUNT LLC/BYU HENRY CTL FAC	14	17
1280	0056	14139	PLAINS MARKETING LP/ST GABRIEL TERMINAL	9	0
1280	0057	32141	BRIDGELINE HOLDINGS LP/TALLY HO CS	1	0
1280	0058	20411	TEXAS PETRO INVESTMENT CO/BAYOU BLEU CENTRAL FAC #2	28.17	71.49
1280	0065	8072	HILCORP ENERGY CO/BAYOU BOUILLON PF	15	10
1280	0066	32145	HILCORP ENERGY CO/NW BAYOU CHOCTAW	57	33
1280	0067	32146	CLK ENERGY INC/BAYOU CHOCTAW FLD PROD FAC	3.17	13.32
1280	0070	84377	OLEUM OPERATING CO, LC/BAYOU DES GLAISES-WILBERT MINERAL B LEASE	7.17	16.35
1280	0082	26984	CIBA SPECIALTY/ST. GABRIEL PLANT	4	3
1280	0088	32161	OLEUM OPERATING CO, LC/BYU HENRY FLD PF	8.26	14.58
1280	0092	51854	CARVILLE ENERGY LLC/CARVILLE ENERGY CENTER	0	220
1280	0094	84483	SOURCE PETROLEUM INC/FROG LAKE	24	31
1280	0096	85652	AEP CORP/VENTURES LEASE CO/PLAQUEMINE COGEN	11	307
1280	0100	89512	LIBERTY RESOURCES INC/DUGAS & LEBLANC LTD ET AL #1	20.55	4.98
1280	0101	89237	INEOS LLC/INEOS OXIDE	35	0
1280	0107	113313	LINDER OIL CO/DESTEC VENTURES FAC	4	0
1280	0108	118389	TEXAS PETROLEUM INVESTMENT CO/BAYOU BLEU-CENTRAL FAC #1	7.51	12.67
1280	0109	119219	JP OIL CO INC/WHITE CASTLE DEEP PROD FAC	15.57	4.17
1280	0110	123784	PETRO-HUNT LLC/WILBERT E-1 WELLSITE	0	2
1280	0111	123785	PETRO-HUNT LLC/WILBERT B-3 WELLSITE	0	1
1280	0140	101588	PETROQUEST ENERGY LLC/EEX CORP PF #1	55	21
1740	0001	4990	BP AMERICA PROD/LOCKHART CROSSING CF # 1	5	11
1740	0002	17042	DENBURY RESOURCES INC/LOCKHART CROSS WILCOX CF3	41	17
1740	0003	1467	EAST JORDAN IRON WORKS	1	10
1740	0013	6858	GRIFFIN INDUSTRIES, INC	0	4
1740	0014	80537	DELTA ENVIRONMENTAL PRODUCTS, INC	21	0
1740	0015	19875	WEYERHAEUSER CO/HOLDEN SAWMILL & LOG PROCESS	255	30
1740	0016	32465	TMR EXPLORATION INC/LVG WXI RA SU LB	16.28	1.06
1740	0025	11767	WASTE MANAGEMENT OF LA, LLC/WOODSIDE LANDFILL	5.39	8.39
1740	0033	99952	DENBURY ONSHORE LLC/OM BARNETT #2 FACILITY	14	17
1740	0040	9154	THE SHAW GROUP/SUNLAND FABRICATORS	26.67	4.63
1740	0044	115181	DESTIN RESOURCES LLC/WEYERHAEUSER #2 PF	4	0
1740	0046	120886	DENBURY ONSHORE LLC/SL 7729 #2 WELLSITE	8	0
2260	0001	1305	ALMA PLANTATION LLC	16	268
2260	0002	1272	BIG RIVER INDUSTRIES INC	88	439
2260	0003	19197	KESTREL RES INC/FORDOCHE GAS PLNT	33	6
2260	0004	25972	BP AMERICA PROD CO./JUDGE DIGBY	19	16
2260	0005	38867	LA GENERATING LLC/BIG CAJUN 2 PWR PLNT	235	17193
2260	0010	11917	LA GENERATING LLC/BIG CAJUN 1 PWR PLNT	2	2
2260	0023	4992	BP AMERICA PROD CO./MORGANZA CTB 1	16	5
2260	0030	4795	SOURCE PETROLEUM, INC/FORDOCHE CS 1 CF8 TB 18	118	3
2260	0033	4006	SOURCE PETROLEUM, INC/FORDOCHE CF 3 TB 3	49	0
2260	0037	103258	SOURCE PETROLEUM INC/FORDOCHE SWD TB	31	21
2260	0039	88052	CHAPARRAL ENERGY INC/J E JUMONVILLE 5	0	0
2260	0041	32720	HILCORP ENERGY CO/FORDOCHE LONG FAIRCHILD PF	37	61

2260	0057	26328	LA ENERGY & POWER AUTHORITY/NEW ROADS DIESEL PWR PLT	0	1
2260	0064	39678	CHESAPEAKE OPER INC/BROWN TRUST FACILITY	0	0
2260	0067	88302	PENNINGTON OIL & GAS INTEREST/R LACOUR #1 PF	22	8
2260	0073	106348	PENNINGTON O&G INTEREST LLC/LICHTENBERG #1 PROD FAC	15	2
2260	0074	118023	CHAPARRAL ENERGY INC/JUMONVILLE 2NDARY DEHY FAC.	0	0
2260	0075	25491	WASTE MANAGEMENT OF LA LLC/RELIABLE LANDFILL	18.18	0.11
2260	0076	120300	PENNINGTON O&G INTEREST LLC/LICHTENBERG #2 PROD FAC	12	2
2260	0077	116634	MERIT ENERGY CO/FALSE RIVER GAS ALLOCATION FAC	12.36	3.92
2540	0002	71	GULF SOUTH PIPELINE CO/MONTPELIER CS	63	1187
2540	0003	2565	TRANSCONTINENTAL GAS PIPE LINE/STN 65	110	875
2540	0022	19872	AMERCHOL CORP/GREENSBURG	70	12
2540	0024	32793	FLORIDA GAS TRANSMISSION CO/PINE GROVE CS 340	0	64
3120	0001	17161	EXXONMOBIL PROD CO/BR GAS PLANT	0.71	78.34
3120	0004	2519	DSM COPOLYMER/ADDIS PLANT	248	117
3120	0006	4174	SID RICHARDSON CARBON CO/ADDIS PLT	105	404
3120	0008	4056	HARRY L. LAWS & CO,INC/CINCLARE CENTRAL FACTORY	8	96
3120	0010	2366	PLACID REFINING CO LLC/PT ALLEN	311	827
3120	0015	3473	SHINTECH LOUISIANA LLC/ADDIS PLANT B	0	0
3120	0043	1648	BP LUBRICANTS USA INC/PORT ALLEN FACILITY	16	10
3120	0044	9495	ENGELHARD CORP/PORT ALLEN WORKS	52.02	47.4
3120	0045	302	T.T. BARGE SERVICE MILE 237, LLC/BR SHIPYARD	31.29	5.35
3120	0056	858	EXXONMOBIL REF & SUPPLY CO/ANCHORAGE TNK FRM	30	1
3120	0059	25344	SOUTHERN IONICS INC/HPA PORT ALLEN PLANT	4.69	3.9
3120	0062	26217	INTL PAINTING CORP	42	0
3120	0065	40198	B R FRACTIONATORS/PLT 1	26	38
3120	0070	83425	SHINTECH LOUISIANA, LLC/ADDIS PLANT A	33	34
3120	0071	43634	TRINITY MARINE PRODUCTS INC/PLANT 48	24	4
3120	0073	11059	SPECIALTY APPLIC. SVCS/PT ALLEN FAC.	13	2
3120	0082	98796	EXXONMOBIL PIPELINE CO/ANCHORAGE TERMINAL	11	0
3160	0003	2073	TEMBEC USA LLC/ST FRANCISVILLE MILL	570	708
3160	0004	7345	TEXAS EASTERN TRANSMISSION, LP/ST FRANCISVILLE CS	12	196
7777	0004	33626	HILCORP ENERGY CO/C B CATFISH LAKE	5	8
7777	0005	33620	BURLINGTON RESOURCES OIL & GAS CO/C B BORGNE	0	1
7777	0054	12146	COOPER/T SMITH/BILL HINES BARGE	0.99	21.87
7777	0078	33564	COOPER/T.SMITH STEVEDORING CO/AMERICA	2.42	74.18
7777	0094	33568	COOPER/T SMITH/THE MARILYN G BARGE	1.41	24.57
7777	0103	33570	COOPER/T SMITH/DENISE M BARGE	1.64	28.44
7777	0134	33579	COOPER/T.SMITH STEVEDORING CO/RG-1 WEIGH RIG	0	0
7777	0192	30275	RUSH INDUSTRIES	0	0
7777	0216	33661	CHEVRON USA INC/CB COTE BLANCHE	9	45
7777	0220	33662	ENERVEST OPERATING LLC/C B TIMBALIER	13	76
7777	0255	33646	BRANDT PEDERSON CONST.,INC/WOODWASTE PIT BURNER	1.2	1.9
7777	0275	33665	CHEVRON USA INC/CB MISSISSIPPI	0	0
7777	0277	33667	BASIC IND INC/SANDBLAST YARD	7	4
7777	0346	90295	COOPER/T SMITH/BABE DERRICK BARGE	1.99	24.77
7777	0347	90296	COOPER/T SMITH/THE 515 BARGE	1.29	22.64

TPY: 15477.62 57410.46

TPD: 42.40 157.29

Total Voc Nox

Mobile source contribution: 44.94 332.37
0.12 0.91



State of Louisiana
Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

Certified Mail No.: 7002 0460 0002 6051 7473

Mr. Marshall Owens
BCP Liquidators LLP
1555 Cottondale Dr., Suite 2
Baton Rouge, LA 70815

Agency Interest No. 121722
Activity No. PER20050002

RE: Emission Reduction Credits, BCP Liquidators LLP, Geismar, Ascension Parish, Louisiana

Dear Mr. Owens:

Please find enclosed your NO_x Emission Reduction Credit (ERC) Certificate. The NO_x balance of 67.65 tons reflects the transfer of 4 tons to Air Products and Chemicals, Inc. – Syngas Plant (AI 2679, Activity Number PER20050003). If you have any questions, please call Keith Jordan at (225) 219-3613.

Sincerely,

Chuck Carr Brown, Ph.D.
Assistant Secretary

5/3/05

Date

c: EPA Region VI

Louisiana Department of Environmental Quality Emission Reduction Credit Certificate

Item number: 121722PER20050002

Owner: BCP Liquidators LLP

Phone Number: 225-924-4187

Company: 1555 Cottondale Dr., Suite 2

Address: Baton Rouge, LA 70815

EMISSION REDUCTION INFORMATION

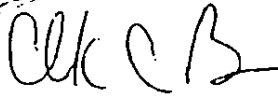
Physical Location: Geismar
Ascension Parish

Method of ERC creation: Transfer of 4 tons of ozone season credits to Air Products and Chemicals, Inc.

Pollutant: Ozone Season NO_x ERC Balance: 67.65 Tons Offsets

Date of emission reduction: 1/1/2001

Permit Number: 2303, 2021 (M-1), and 2699-V1


Assistant Secretary

5/3/05

Date

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
BCP LIQUIDATING LLC
NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC.

BCP Liquidating LLC, 1555 Cottdale Dr., Suite 2, Baton Rouge, LA 70815, Air Permit Number 2303, 2021 (M-1), and 2699-V1, proposes to withdraw emission reductions credits (ERC) of Ozone Season NO_x ERCs from the LDEQ Emission Reductions Credits Banking System. This action is due to a transfer of ERCs from BCP Liquidating to Air Products and Chemicals, Inc. – Syngas Plant, Agency Interest Number 2679, PO Box 610, Geismar, Louisiana 70734-0610. The total estimated emission transfer, in tons per year (TPY) are as follows:

Facility	NO _x Balance Before	NO _x Transferred	NO _x Balance After
Total (tons)	71.65	4	67.65

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this proposed emissions transfer may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, May 2, 2005.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The Analysis Of Validity Of Emission Reductions As Ercs and supporting documentation are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be reviewed at the Ascension Parish Library – Gonzales Branch located at 708 South Irma Boulevard, Gonzales, LA 70737.

Inquiries or requests for additional information regarding this permit action should be directed to Mr. Keith Jordan, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3003.

Persons wishing to be included on the LDEQ permit public notice mailing list should contact Ms. Soumaya Ghosn in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3276, or by email at maillistrequest@ldeq.org.

Permit public notices can be viewed on the LDEQ Permits public Web page at WWW.deq.state.la.us/news/PubNotice/.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 121722, Permit Number 2303, 2021 (M-1), and 2699-V1, and Activity Number PER20050002.

Publication Date: Friday, April 1, 2005

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ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERCS

BCP LIQUIDATING LLC
NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC.
GEISMAR, ASCENSION PARISH, LOUISIANA
AI NO.: 121722, ACTIVITY NO.: PER20050002

Background

BCP Liquidating LLC (BCP), Agency Interest Number 121722, successor to Borden Chemical and Plastics Operating Limited Partnership, wishes to transfer 4 tons of Ozone Season NO_x Emission Reduction Credits to Air Products and Chemicals, Inc. – Syngas Plant, Agency Interest Number 2679. BCP filed Chapter 11 bankruptcy on April 3, 2001, and has ceased all operations at the Geismar facility. Potential credits were reviewed from BCP Liquidating's Methanol plant, Acetylene plant and Cogeneration unit. The following credits were determined to be valid for use during Ozone Season (5/1 – 9/30) and can be transferred from BCP Liquidating LLC (BCP) to Air Products and Chemicals:

Facility	NO _x Balance Before	NO _x Transferred	NO _x Balance After
Total (O ₃ tons)	71.65	4	67.65

Analysis of Validity

I. LAC 33:III.607.C.1:

If the design value for the nonattainment area is above the 1-hour national ambient air quality standard (NAAQS) for ozone, the department shall compare the current total point-source emissions inventory for the modeled parishes (Ascension, East Baton Rouge, East Feliciana, Iberville, Livingston, Pointe Coupee, St. Helena, West Baton Rouge, and West Feliciana) to the base case inventory except that beginning with the 2005 emissions inventory, this comparison shall be made to the base line inventory.

As can be seen in the following table, the Current Total Point-Source Emissions Inventory for the modeled parishes does not exceed the Base Case Inventory.

	VOC	NO _x
Aggregate point-source emissions inventory for either NO _x or VOC from the nine modeled parishes. ^a	15,285 tons/year	74,803 tons/year
	41.85 tons/day	204.8 tons/day
Any banked ERC and pending ERC applications originally included in the base case inventory that have not expired. ^b	16.0 tons/day	10.91 tons/day
Current Total Point-Source Emissions Inventory ^c	57.85 tons/day	215.71 tons/day
Base Case Inventory ^c	71.3 tons/day	264.0 tons/day

^a Aggregate point-source emissions from the nine modeled parishes, derived from Year 2,002 Certified Totals of Criteria Pollutants for Louisiana, <http://www.deq.state.la.us/evaluation/eis/2002.xls>.

^b Current Total Point-Source Emissions Inventory—the aggregate point-source emissions inventory for either NO_x or VOC from the nine modeled parishes compiled from Emission Inventory System (EIS) records and updated annually in accordance with LAC 33:III.919 plus any banked ERC and pending ERC applications originally included in the base case inventory that have not expired.

^c Base Case Inventory—the aggregate point-source emissions inventory for either NO_x or VOC from the nine modeled parishes, as modeled for the 2005 Attainment Plan and Transport Demonstration SIP dated December 2001, which includes 1997 actual emissions from point sources, banked ERC and pending ERC applications where the emission reduction occurred between January 1, 1990 and December 31, 1997, and adjustments for growth. Separate inventories have been established for NO_x and VOC.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERCS

BCP LIQUIDATING LLC NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC. GEISMAR, ASCENSION PARISH, LOUISIANA AI NO.: 121722, ACTIVITY NO.: PER20050002

- II. Per LAC 33:III.615.A, all applications for banking emission reductions shall be submitted by March 31 following the year in which the reductions occurred. The following table lists the application's submittal dates:

Facility	Permit	Date of Reduction	Date of ERC application
Methanol Plant	2303	01, 2001	1/15/2002
Acetylene Plant	2021 (M-1)	01, 2001	2/11/2002
Cogen I and III	2699-V1	01, 2001*	2/28/2003

* The operation of Cogens I and III ceased in January 2001, but under EPA's reactivation policy, the units could have been restarted within two years of the cessation of operations. See *In re Monroe Operating Plant (EPA 1999)*. The emission reductions occurred and became permanent at Cogens I and III on December 20, 2002 when the units were unable to be sold after entering bankruptcy.

- III. Per the requirements of LAC 33:III.607.B and C, the credits were reviewed to ensure they are surplus, permanent, quantifiable, and enforceable.

For sources exempt from LAC 33:III.Chapter 22 – Control of Emissions of Nitrogen Oxides (NO_x), the lower of: [the permitted emissions] or [actual emissions for the last two years that was representative of normal operations] was compared to the allowables after (in all cases for this review, 0) to determine the creditable amount. The resulting credits are available year-round. Ozone season runs from May 1 to September 30 of each year, five of the twelve months. To determine the amount of Ozone Season Credits allowable for sources not subject to Chapter 22, the total amount is multiplied by 153 and divided by 365 (the ratio of ozone season to non-ozone season days in the year).

For sources subject to LAC 33:III.Chapter 22 – Control of Emissions of Nitrogen Oxides (NO_x), the lower of the: [permitted emissions] or [actual emissions for the last two years that was representative of normal operations] or [Chapter 22 limitation] was compared to the allowables after (in all cases for this review, 0) to determine the creditable amount for Ozone season.

The following tables show the analysis of each permit and emission points:

Methanol Plant – Permit 2303, issued 3/6/1995¹

Sources not subject to LAC 33:III.Chapter 22 Control of Emissions of Nitrogen Oxides (NO_x)

Emission Point	78-5		All Year
Allowables Before (Tons/year)	0.3	Allowables Before:	0.3
Actual Emissions (Tons/year)	0.3	Actual Emissions:	0.3
Allowables After (Tons/year)	0	Allowables After:	0
Hours/day:	24	Creditable Change:	0.3
Days/week:	7		
Weeks/year:	52		

¹ LDEQ concurs with BCP's position that 1998 and 1999 are more representative of normal stationary source operations for baseline calculations. See LAC 33:III.605.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERCS

BCP LIQUIDATING LLC
NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC.
GEISMAR, ASCENSION PARISH, LOUISIANA
AI NO.: 121722, ACTIVITY NO.: PER20050002

Emission Point	78-6
Allowables Before (Tons/year)	0.3
Actual Emissions (Tons/year)	0.3
Allowables After (Tons/year)	0
Hours/day:	24
Days/week:	7
Weeks/year:	52

		All Year
Allowables Before:		0.3
Actual Emissions:		0.3
Allowables After:		0
Creditable Change:		0.3

Sources subject to LAC 33:III.Chapter 22 Control of Emissions of Nitrogen Oxides (NO_x)

Emission Point	10
Allowables Before (Tons/year)	435.24
Actual Emissions (Tons/year)	390.46
O ₃ Emissions Limit (lb/MM BTU)	0.16
Allowables After (Tons/year)	0
Operating Rate (MM BTU/hr)	286.8
Hours/day:	24
Days/week:	7
Weeks/year:	52

	5/1 - 9/30	10/1 - 4/30
Allowables Before:	182.44307	252.79693
Actual Emissions:	163.67227	226.78773
Chapter 22 Limit:	84.250368	NA
Allowables After:	0	0
Creditable Change:	84.250368	226.78773

Emission Point	24
Allowables Before (Tons/year)	31.76
Actual Emissions (Tons/year)	21.54
O ₃ Emissions Limit (lb/MM BTU)	0.08
Allowables After (Tons/year)	0
Operating Rate (MM BTU/hr)	226.8
Hours/day:	24
Days/week:	7
Weeks/year:	52

	5/1 - 9/30	10/1 - 4/30
Allowables Before:	13.313096	18.446904
Actual Emissions:	9.0290959	12.510904
Chapter 22 Limit:	33.312384	NA
Allowables After:	0	0
Creditable Change:	9.0290959	12.510904

Emission Point	7
Allowables Before (Tons/year)	63.38
Actual Emissions (Tons/year)	15.09
O ₃ Emissions Limit (lb/MM BTU)	0.08
Allowables After (Tons/year)	0
Operating Rate (MM BTU/hr)	282
Hours/day:	24
Days/week:	7
Weeks/year:	52

	5/1 - 9/30	10/1 - 4/30
Allowables Before:	26.567507	36.812493
Actual Emissions:	6.3253973	8.7646027
Chapter 22 Limit:	41.42016	NA
Allowables After:	0	0
Creditable Change:	6.3253973	8.7646027

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERCS

**BCP LIQUIDATING LLC
NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC.
GEISMAR, ASCENSION PARISH, LOUISIANA
AI NO.: 121722, ACTIVITY NO.: PER20050002**

Emission Point	8
Allowables Before (Tons/year)	167.93
Actual Emissions (Tons/year)	92.31
O3 Emissions Limit (lb/MM BTU)	0.08
Allowables After (Tons/year)	0
Operating Rate (MM BTU/hr)	584.4
Hours/day:	24
Days/week:	7
Weeks/year:	52

	5/1 - 9/30	10/1 - 4/30
Allowables Before:	70.392575	97.537425
Actual Emissions:	38.694329	53.615671
Chapter 22 Limit:	85.836672	NA
Allowables After:	0	0
Creditable Change:	38.694329	53.615671

Emission Point	9
Allowables Before (Tons/year)	320.18
Actual Emissions (Tons/year)	200.29
O3 Emissions Limit (lb/MM BTU)	0.08
Allowables After (Tons/year)	0
Operating Rate (MM BTU/hr)	856.8
Hours/day:	24
Days/week:	7
Weeks/year:	52

	5/1 - 9/30	10/1 - 4/30
Allowables Before:	134.21244	185.96756
Actual Emissions:	83.957178	116.33282
Chapter 22 Limit:	125.84678	NA
Allowables After:	0	0
Creditable Change:	83.957178	116.33282

Emission Point	95-01
Allowables Before (Tons/year)	31.69
Actual Emissions (Tons/year)	32.21
O3 Emissions Limit (lb/MM BTU)	0.08
Allowables After (Tons/year)	0
Operating Rate (MM BTU/hr)	271.2
Hours/day:	24
Days/week:	7
Weeks/year:	52

	5/1 - 9/30	10/1 - 4/30
Allowables Before:	13.283753	18.406247
Actual Emissions:	13.501726	18.708274
Chapter 22 Limit:	39.833856	NA
Allowables After:	0	0
Creditable Change:	13.283753	18.406247

		All Year
Non-Chapter 22 Credits		0.6
	5/1 - 9/30	10/1 - 4/30
Non-Chapter 22 Credits	0.2515068	0.3484932
Chapter 22 Credits	235.54012	436.41797
Total Credits (tons)	235.79163	436.76647

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERCS

BCP LIQUIDATING LLC NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC. GEISMAR, ASCENSION PARISH, LOUISIANA AI NO.: 121722, ACTIVITY NO.: PER20050002

IV. Summarize emissions from each unit

Methanol Plant	All Year	
Non-Chapter 22 Credits		0.6
	5/1 - 9/30	10/1 - 4/30
Non-Chapter 22 Credits	0.2515068	0.3484932
Chapter 22 Credits	235.54012	436.41797
Total Credits (tons)	235.79163	436.76647

Acetylene Plant	All Year	
Non-Chapter 22 Credits		54.776
	5/1 - 9/30	10/1 - 4/30
Non-Chapter 22 Credits	22.960899	31.815101
Chapter 22 Credits	49.858718	125.06258
Total Credits (tons)	72.819616	156.87768

Cogen I and III	All Year	
Non-Chapter 22 Credits		0.00
	5/1 - 9/30	10/1 - 4/30
Non-Chapter 22 Credits	0.00	0.00
Chapter 22 Credits	212.84149	347.56384
Total Credits (tons)	212.84149	347.56384

On December 2, 2004, Texas Eastern Transmission LP - St Francisville Station purchased 322 tons of Ozone Season NO_x Emission Reduction Credits (Agency Interest Number 7345, Activity Number PER20040001) and Texas Eastern Transmission LP - White Castle Compressor Station purchased 127.8 tons of Ozone Season NO_x Emission Reduction Credits (Agency Interest Number 7359, Activity Number PER20040001). This transfer of 449.8 tons to Texas Eastern left a balance of 71.65 tons per year of Ozone Season NO_x Emission Reduction Credits.

Facility	Permit	NO _x Balance Before	NO _x Transferred	NO _x Balance After
Methanol Plant	2303	235.79	164.14	71.65
Acetylene Plant	2021 (M-I)	72.82	72.82	0.0
Cogen I and III	2699-VI	212.84	212.84	0.0
Totals (O ₃ tons)		521.45	449.8	71.65

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERCS

**BCP LIQUIDATING LLC
NO_x TRANSFER TO AIR PRODUCTS AND CHEMICALS, INC.
GEISMAR, ASCENSION PARISH, LOUISIANA
AI NO.: 121722, ACTIVITY NO.: PER20050002**

For this transaction, Air Products and Chemicals, Inc. – Syngas Plant wishes to purchase 4 tons of Ozone Season NO_x Emission Reduction Credits.

Facility	NO _x Balance Before	NO _x Transferred	NO _x Balance After
Total (O ₃ tons)	71.65	4	67.65